11 July 2003
In the Case of RM-10740:

I respectfully submit to the commissioners
that the proposals of Mr. Lonneke and Mr. Ladisky in
RM-10740 not be adopted, on the following grounds:

1. The bandwidth standards they propose are technically
flawed, in that they do not adequately define the
bandwidth limits. Simply stating "2.8 Khz" is meaningless
without reference to at least two amplitude levels on
the bandwidth bell curve and a defined standard test modulating
signal. To adopt a rule without these exact standards
is to invite a flood of complaints based on subjective guesses.

2. The petitioners have not presented documentation
concerning how they concluded that the signals about which
they complain were overly broad, other than their subjective
senses. For instance- many HF receivers are subject to
distortion in the front-end at high signal levels which creates
spurious products within the front-end of the receiver.
Improper use and/or adjustment of noise blanking circuits
can create spurious products within the receiver's IF circuitry.
The petitioner's have presented no technical standards
whatever on which to base their complaint, so we cannot
know if the above conditions are or are not the case.

3. The petitioners have not demonstrated that the
practice of which they complain is either currently
wide-spread or increasing. In fact, the practice is
limited to a vanishingly small number of licensees.
Moreover, the history of Amateur Radio strongly suggests
that, over a reasonable period of time, peer pressure
and a waning of interest in this "enhanced SSB" mode
will correct the problem.
The petitioners are asking the FCC to go to
the effort and expense of rule making over
a minor, self-limiting problem.

4. Adoption of this rule would go against the FCC's
stated objective of streamlining and reducing
government rules and restrictions.
There are already rules within Part 97 (97.307, 97.101)
that stipulate transmissions shall not use more bandwidth
than is required for the type of emission used.
While "enhanced SSB" is an experimentation- a defined goal
of the Amateur service- it is not a new type of emission
and is, therefore already in violation of Part 97.
New rule making is not needed.
If licensees wish to experiment with the variation of
SSB signals known as "enhanced SSB,"
they can do so at VHF frequencies where there are less
restrictions, or apply for a Part 5 Experimental license.

5. This rule making could lead to the requirement of
type-acceptance of transmitters in the Amateur service,
or even channalization. Such a requirement would utterly

destroy one of the stated purposes of the Amateur service:
to encourage experimentation and provide a pool of
people acquainted with communications technology.
Adoption of type-acceptance rules would effectively
end the Amateur service, leaving only "plug-n-play"
operators without justification for the spectrum
allotted them. It would also require the FCC to
draft an entire new class of rules and standards
to implement the type-acceptance, with the resulting
expense in both budgetary and human resources.
Current Part 97 rules adequately address
the issues in the petitioner's complaint.

6. Adoption of this rule would seriously impact the
legitimate users of A3H modulation. These users are
already restricted to effectively reduced radiated power.
They voluntarily restrict themselves to small
and agreed-upon frequency "windows."
They are generally well behaved and tolerant of the
interference they receive from SSB transmissions.
Moreover, this group of legitimate users work to
preserve the history and development of amateur,
broadcast and military radio.
They also provide a pool of technical expertise
useful to the A3H broadcast industry.
Notwithstanding the emotional protests of a few
who dislike A3H, there is no credible evidence
that these A3H transmissions have caused
significant hardship on any other licensee.
Implementation of this arbitrary bandwidth
standard could effectively ban
these legitimate licensees from the air.

Thank you for your time
and your consideration of these comments.

Respectfully Submitted,

David L. Stinson
Commission licensee AB5S
Wylie, Texas